

REMARKS

The Applicants respectfully request reconsideration of this application in view of the above amendments and the following remarks.

35 U.S.C. § 112 Rejection, Second Paragraph

Claims 1-36 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Applicants respectfully submit that the claims have been amended to overcome the rejection. Accordingly, Applicants respectfully request that the Examiner withdraw the objection to the claims.

35 U.S.C. §102(b) Rejection - Grisenthwaite

Claims 1-9, 11-15, 17-24, 26-30 and 32-36 have been rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Pub. No. 2002/0065860 to Grisenthwaite et al. (hereinafter "Grisenthwaite"). The Applicants respectfully submit that the present claims are allowable over Grisenthwaite.

Claim 1 recites:

"1. A method of executing an instruction comprising:

receiving residual data of a first image and decoded pixels of a second image;

*zero-extending a plurality of unsigned data **operands of an 8-bit precision** of the decoded pixels using one or more qualifiers to determine whether upper or lower unsigned data operands are operated on to produce a plurality of unpacked data operands;*

*adding a plurality of signed data **operands of a 16-bit precision** of the residual data to the plurality of unpacked data operands producing a plurality of signed results, **wherein the 16-bit precision is greater than the 8-bit precision**;*

saturating the plurality of signed results producing a plurality of unsigned results, the unsigned results having the 8-bit precision which is less than the 16-bit precision".

As understood by Applicants, Grisenthwaite does not disclose these limitations or render them obvious.

Grisenthwaite discusses in part an ADD8TO16 instruction. FIG. 4 of Grisenthwaite schematically illustrates the action of a SIMD type arithmetic instruction. In FIG. 4, register Rm has four 8-bit portions, p0, p1, p2, and p3. The register Rn has two 16-bit data values a0 and a2. FIG. 4 clearly shows that the data of the result register Rd are each **16-bits**.

Accordingly, the ADD8TO16 instruction of Grisenthwaite does not disclose or render obvious ***"saturating the plurality of signed results producing a plurality of unsigned results, the unsigned results having the 8-bit precision which is less than the 16-bit precision"***.

Anticipation under 35 U.S.C. Section 102 requires every element of the claimed invention be identically shown in a single prior art reference.

For at least one or more of these reasons, claim 1, and its dependent claims, are believed to be allowable.

Independent claims 14, 23, 30, and 37, and their respective dependent claims, are believed to be allowable for one or more similar reasons.

35 U.S.C. §103(a) Rejection – Grisenthwaite, Paver

Claim 10 has been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Pub. No. 2002/0065860 to Grisenthwaite et al. (hereinafter "Grisenthwaite") in view of U.S. Pub. No. 2002/0083311 to Paver (hereinafter "Paver").

Claim 10 has been cancelled.

35 U.S.C. §103(a) Rejection – Grisenthwaite, Paver

Claims 16, 25 and 31 have been rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Grisenthwaite in view of Paver. Without admitting that these references could or should be combined, the Applicants respectfully submit that the present claims are allowable over Grisenthwaite and Paver.

Claim 16, 25 and 31 depend from, and include all of the limitations of, independent claims 14, 23, and 30, respectively. As discussed above, Grisenthwaite does not not disclose or render obvious the limitations of claims 14, 23, and 30. As understood by Applicants, Paver does not remedy **all** of what is missing from these references and/or the Examiner does not appear to have articulated where **all** of these missing limitations are found in Paver. Accordingly, Applicants respectfully submit that independent claims 14, 23, and 30 are believed to be allowable over Grisenthwaite and Paver. Dependent claims 16, 25 and 31 are believed to be allowable for at least this reason, as well as for the recitations set forth in each of these dependent claims.

Conclusion

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the cited art of record and are in condition for allowance. Applicants respectfully request that the rejections be withdrawn and the claims be allowed at the earliest possible date.

Request For Telephone Interview

The Examiner is invited to call Brent E. Vecchia at (303) 740-1980 if there remains any issue with allowance of the case.

Request For An Extension Of Time

The Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17 for such an extension.

Charge Our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: November 23, 2010

By



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